

1275

**K-65 SAMPLING PROCEDURES**

**8-10-90**

**DOE/USEPA**

**DOE-1711-90**

**2**

**LETTER**



**Department of Energy**

FMPC Site Office  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705  
(513) 738-6319

1275

**AUG 10 1990**

DOE-1711-90

Catherine A. McCord, Remedial Project Director  
U. S. Environmental Protection Agency  
Region V - 5HR-12  
230 South Dearborn Street  
Chicago, IL 60604

Dear Ms. McCord:

**K-65 SAMPLING PROCEDURES**

Reference: Letter, DOE-1519-90, G. W. Westerbeck, U.S. DOE to  
C. A. McCord, U.S. EPA, and G. E. Mitchell, Ohio EPA,  
"K-65 Sampling Procedures", dated July 25, 1990

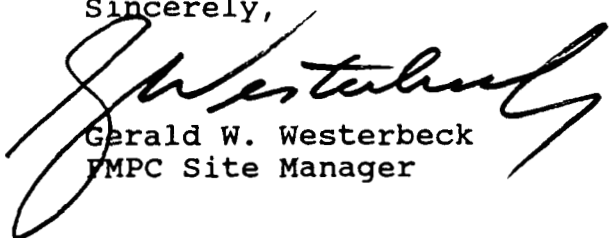
The K-65 Sampling Procedures, which were hand-delivered to U. S. EPA and Ohio EPA on July 18, 1990 and also transmitted by the referenced letter, require U.S. EPA approval prior to implementation. The K-65 Sampling Project is now scheduled to begin August 27, 1990; its completion is critical to maintaining the schedule and also providing valuable information for Operable Unit 4.

Ohio EPA approval of the procedures has been granted and is enclosed.

When reminded of this requirement in a meeting with Mr. Jack Craig on August 7, 1990, you stated that you had not reviewed our submittal yet. Let me re-emphasize that your review/approval of the subject procedures is an essential step in the execution of the RI/FS for Operable Unit 4. The berm sampling has already been delayed due to our not having received your approval yet.

If you have any questions, please contact Jack Craig, at (513) 738-6159.

Sincerely,

  
Gerald W. Westerbeck  
FMPC Site Manager

DP-84:Craig

Enclosure: As stated

cc w/encl.:

L. P. Duffy, EM-1, FORS  
W. R. Bibb, DP-80, ORO  
G. E. Mitchell, OEPA-Dayton  
K. Pierard, USEPA-5  
D. Ullrich, USEPA-5  
P. Q. Andrews, USEPA-5  
D. A. Kee, USEPA-5  
E. Schuessler, PRC



State of Ohio Environmental Protection Agency

**Southwest District Office**

40 South Main Street  
Dayton, Ohio 45402-2086  
(513) 285-6357  
FAX (513) 285-6249

1275

Richard F. Celeste  
Governor

July 26, 1990

RE: K-65 SAMPLING

Mr. Bobby Davis  
DOE - FMPC  
P.O. Box 398705  
Cincinnati, Ohio 45239

Dear Mr. Davis:

The purpose of this letter is to conditionally approve the K-65 Silos Sampling and Analysis Plan and the K-65 Silo Embankment and Subsoils Sampling and Analysis Plan, providing the comments attached are addressed. These plans are consistent with requirements outlined in the State of Ohio/DOE-Westinghouse Consent Decrees (12-2-88). If you have any questions regarding these comments please contact me.

Sincerely,

Graham E. Mitchell  
DOE Coordinator

GEM/bjb

cc: Maury Walsh, CO  
Jack Van Kley, Attorney General's Office  
Catherine McCord, USEPA

Date Rec'd 7-30-1990  
Log D-2789  
File 9550 3  
Library

**OEPA COMMENTS ON K-65 SILO SAMPLING  
AND ANALYSIS PLAN**

1. Page 7, middle paragraph - It should be made clear that this scan will provide "Worst Case Condition" for radiological parameters only.
2. Page 12, 2.3 - The first paragraph states that an additional core will be collected from silo 1 to conduct laboratory stabilization studies. Considering the differences between silo 1 and 2's contents, samples should be collected from both silos for these studies.
3. Page 21, 3.2.3 - In the first paragraph, explain why the lime sludge is similar to K-65 residues.
4. Page 28, top paragraph - Paperwork in ziplock bags should not be in contact with the residues.
5. Page 29, Table 3-2 - Since the screening of alternatives reports discusses contaminant separation and possible recovery of metals (gold, platinum, palladium), shouldn't these parameters be analyzed. These silos should only be sampled once. Collect enough samples for all future analytical work and bench tests.
6. Appendix A, Page 11 - in 7.3.18 there is a caution stating that the sampling device should not be operating during removal. However, in 7.3.18.1 the operator is told to operate the device if difficulty is encountered. The purpose of this is understood but the wording is unclear.

**K-65 SILO EMBANKMENT AND SUBSOILS  
SAMPLING AND ANALYSIS PLAN**

1. No comments - Previous concerns were addressed in January 10, 1990, submittal and conference call. That plan was approved verbally.

bjb